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COMMONWEALTH OF MASSACHUSETTS

2024 APR 10 AM 7:54

NORFOLK, ss.

CLERK OF THE COURTS
NORFOLK COUNTY

SUPERIOR COURT
NO. 2282-CR-00117

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|-----------------|---|
| _____ |) |
| COMMONWEALTH OF |) |
| MASSACHUSETTS, |) |
| Plaintiff |) |
| V. |) |
| KAREN READ, |) |
| Defendant |) |
| _____ |) |

AFFIDAVIT OF COUNSEL IN SUPPORT OF DEFENDANT'S MOTION IN LIMINE TO EXCLUDE IRRELEVANT, INADMISSIBLE AND PREJUDICIAL PRIOR BAD CHARACTER AND PROPENSITY EVIDENCE

I, Alan J. Jackson, do hereby depose and state that the following is true to the best of my knowledge and belief:

1. I am a Partner at the firm Werksman Jackson & Quinn LLP. I represent Defendant Karen Read, *Pro Hac Vice*.
2. I submit this affidavit on personal knowledge in support of Defendant's Motion *in Limine* to Exclude Irrelevant, Inadmissible and Prejudicial Prior Bad Character and Propensity Evidence.
3. The factual assertions set forth in the above motion are true and correct to the best of my knowledge.
4. Testimony regarding the events that purportedly transpired on December 31, 2021, constitutes inadmissible propensity and bad character evidence, which is extraordinarily prejudicial to Ms. Read and serves no purpose other than to allow the Commonwealth to put on various witnesses in an attempt to assassinate Ms. Read's character in the eyes of the jury.

5. I believe it is in the interests of justice for this Honorable Court to allow this Motion.

Signed under the pains and penalties of perjury this 9th day of April, 2024.



Alan J. Jackson, Esq.